Imperial Sand Dunes Recreation Area



2012 DRAFT Business Plan



DRAFT

Imperial Sand Dunes Recreation Area 2012 BUSINESS PLAN

Prepared by
United States Department of Interior
Bureau of Land Management
California Desert District
El Centro Field Office

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2012 DRAFT Business Plan

Executive Summary

This document updates the 2003 Imperial Sand Dunes Recreation Area (ISDRA) Business Plan (Casey, 2003). Current levels of BLM emergency medical services (EMS) / search and rescue (SAR), law enforcement, and maintenance necessary for overall visitor safety in the ISDRA cannot be sustained within the existing funding program. Since 2003, the cost to manage the ISDRA has continued to increase and sales have steadily declined since 2007. BLM's management goals must be completed within the fiscal constraints of the fee program, particularly in light of the uncertain federal budget climate. Thoughtful prioritization of the agency objectives must occur because they may not all be addressed. The fee program must be updated to address the gaps between the agency objectives, customer needs, and the resources available. Without a modification to the fee program, changes will occur that could lead to road and camping area closures, a decrease in visitor safety, and emergency calls without response from BLM staff.

The proposed fee program at ISDRA would include a coordinated fee collection program between BLM and a private contractor, and the following fee increase:

Preferred Individual Non-commercial Special Recreation Permits (ISRP)		
Permit Type	Off-site	On-site
Weekly	\$40	\$70
Season	\$180	Not available

Free access is proposed during the months of June-September each year. To support local visitors, free access on one Sunday during the months of December and March, and one Saturday in January each year would be scheduled for all visitors in all areas.

Commercial (Vending) fees are also addressed in this plan. An updated market analysis and cost recovery has been completed and the preferred fee schedule addresses the funding gap. Vending activities at ISDRA can contribute to the visitors' experience by providing goods or services on site. This allows a longer stay by visitors by eliminating the need to break camp to re-supply or obtain services. Some vendors at ISDRA have become institutions within the OHV recreation community. They contribute to local and regional economies, and the associated permits are a source of income to the local government entities. Vendor permits are issued to enhance the visitors' recreational experience.

Preferred Commercial Vending Fees at the ISDRA		
Permit Type	Location	Rate
	Roving, Glamis,	
Daily	Dune Buggy Flats,	\$100 / day
	Buttercup	
Season	Gecko Rd. Long	\$7,000
	Term Pad	\$7,000

Introduction

This document updates the previous Imperial Sand Dunes Recreation Area (ISDRA) Business Plan completed on August 21, 2003 (Casey, 2003). Although there have been many changes since that time, the 2003 ISDRA Business Plan contains important historical information. This plan was prepared by the Bureau of Land Management (BLM), El Centro Field Office and is meant to serve as a guiding document for five to ten years.

Individual, non-commercial special recreation permit (ISRP) fees are currently required for motorized recreation in the ISDRA. The fee is collected through a private contractor and visitors pay for each primary vehicle driven into the fee area at the following rates:

ISRP Permit Type	Off-site	On-site
Weekly	\$25	\$40
Season	\$90	\$120

Commercial vendors purchase vendor special recreation permits directly from the BLM. These permits allow them to sell their goods and services on public lands within the ISDRA. Vendors purchase permits at the following rates:

Vendor Permit Type	Rate
Mid-week	\$25
Weekend	\$30
Holiday Weekend	\$60

The objective of this plan is to comply with the Federal Lands and Recreation Enhancement Act (FLREA), BLM Manuals, BLM Handbooks, and subsequent guidance while determining the following:

How much of the ISDRA management program will be funded through fees?

- 1. What will be the most feasible and efficient fee collection method?
- 2. What is a reasonable amount to charge visitors?
- 3. What is equitable amount to charge commercial vendors selling goods and services in the ISDRA?

While meeting the objectives of this document, the BLM will communicate the development and implementation of this plan with visitors to the Dunes.

Issues identified through public scoping

On August 31, 2010, the BLM, El Centro Field Office staff attended a meeting with the ISDRA Desert Advisory Council Sub Group to discuss their concerns about the development of a new business plan. The Sub Group members represent the off-highway vehicle (OHV) and local communities impacted by management actions taken by the BLM in the ISDRA. They receive information from the BLM at the meetings and make management recommendations to the California Desert District Desert Advisory Council (DAC). During the meeting, BLM asked the Sub Group to list issues they would like to see addressed in a new business plan. They are as follows:

The development steps of the business plan should be:

- 1. Meet with ISDRA Desert Advisory Council ISDRA Sub Group
- 2. Post on blogs. Write explicit statements to indicate a management change will occur if there is not a change in the fee collection program.
- 3. Produce a draft business plan.
- 4. Solicit public comment on draft plan.
- 5. Produce a final plan with preferred alternatives.
- 6. Present to DAC.
- 7. Present to RRAC.
- 8. Set fee by September.

The Sub Group identified these steps to make the plan successful.

- 1. Public Notification (*They wanted to ensure public involvement*).
- 2. Following the Rules (Make sure BLM complies with all rules and laws).
- 3. Congressional assistance (Discussion about getting congressional help if needed).
- 4. Compare to NPS sites (Yosemite) (Discussion about the difference in the amount of funding the BLM receives versus other land management agencies.)
- 5. Discuss with Imperial County Board of Supervisors (keep our partners in the loop and make sure we have their support and address their issues).
- 6. Comparisons to other sites: public, private, and state.
- 7. Per vehicle use (Look at charging per OHV instead of per primary street vehicle).
- 8. Go to Recreation Resource Advisory Committee (RRAC) & Desert Advisory Council (DAC) (Need their support and approval to make any changes).
- 9. Public Survey on fee expenditures (look at the survey data we have collected).
- 10. General public acceptance (What is the general acceptance level of the fee program)?
- 11. Communication plan needs to include blogs, newspapers, meetings with groups, public meetings, utilize partner groups such as ASA meetings. (*Identify ways to communicate the importance of fee compliance*).
- 12. Summary of comments (include a summary of comments in the plan).
- 13. Collect public comments, then go to DAC, then go to RRAC meeting.
- 14. Like a NEPA –Range of Alternatives (*They wanted the plan to have a range of alternatives*).

- 15. Notification during dunes season (*The public should be notified early of any changes to the fee program*).
- 16. Solicit suggestions on website.
- 17. Options need to include ways the public can reduce cost of the permit.
- 18. Communicate ISDRA workload cost/benefit.
- 19. Press Release-BLM (communication tool).
- 20. American Sand Association (ASA) "What's New" newsletter (use this as an outreach tool).
- 21. Email comment box (set one up to solicit comments).
- 22. Look at old Business Plan (Review the 2003 business plan).
- 23. What is the difference between selling permits on-site versus off-site?

Notes from brainstorming session with ISDRA Sub Group for fee collection ideas

Notes from brainstorming session with ISDRA Sub Group for fee collection ideas		
Idea	BLM Response	
1. Charge by OHV.	This idea was considered but eliminated due to the increased complexity and high cost to administer a program where each OHV is permitted.	
2. Use similar program as Tonto National Forest watercraft.	This idea was considered but eliminated due to the increased complexity and high cost to administer a program where each OHV is permitted.	
3. BLM do in-house collection instea of using a fee contractor.	d Addressed in alternatives.	
4. CDD-wide process	Beyond the scope of this plan, not addressed.	
5. CDD-wide permit for multiple areas, including the ISDRA	Beyond the scope of this plan, not addressed.	
El Centro Field Office wide permit including ISDRA.	Beyond the scope of this plan, not addressed.	
7. Single or multiple area permits.	Beyond the scope of this plan, not addressed.	
8. Charge for areas that provide Emergency Medical Service (EMS)	This idea was considered but eliminated due to increased complexity and high cost to develop an EMS agency within the BLM.	
9. Charge for EMS calls.	This idea was considered but eliminated due to the increased complexity and high cost to administer a program where BLM charges each rescued individual.	
10. Outsource EMS.	This idea was considered but eliminated due to the high cost of outsourcing.	
11. 2 nd vehicle permit.	This idea was considered but eliminated due to the high administrative cost and fraud reasons addressed in the 2003	

Idea	BLM Response
	business plan. It is critical to keep the transaction process of purchasing a permit to a few seconds to keep customer service at high levels. Creating an administrative process where a primary vehicle and a second vehicle are tied together by family, location, or to each other, could be costly, create long lines, reduce compliance, increase law enforcement staffing / workloads, and decrease customer satisfaction.
12. No fees in summer.	Addressed in alternatives.
13. Day use permits.	This idea was considered but eliminated in order to maintain high levels of fee compliance and keep the cost of enforcement low. Surveys indicate the average visit is three to five days. With a weekly permit, compliance on a vehicle could be completed with one weekly visit. With a daily permit, compliance visits would need to be completed every day and the program would not be cost effective.
14. On-site/off-site cost increase.	Addressed in alternatives.
15. No season permits sold on-site.	Addressed in alternatives.
16. Look at radio frequency identification (RFID).	This idea was considered but eliminated. RFID technology has been studied each of the past seven years and tested in prototype permits. At this time, there are no economically or logistically feasible alternatives for the ISDRA fee program.
17. Look at standard and expanded amenity fees.	This idea was considered but eliminated because ISDRA does not meet the standard amenity fee criteria (U.S. Law, 2004). Expanded fees could decrease revenues since all visitors could purchase an "America the Beautiful" permit off site at any of the cooperating federal agencies and receive a 50% discount at ISDRA. The "America the Beautiful" pass revenues would not be returned to ISDRA. Recreation opportunities and visitor safety would decrease with a loss of revenues and / or the permit price would have to increase to make up the

Idea	BLM Response
	difference in lost revenues.
18. Expanded amenity fees for camping day, week, and season and per OHV.	This idea was considered but eliminated due to the increased complexity and cost to administer a program where each primary vehicle and each OHV can purchase a day, week, or season permits.
19. Change the percentage vendors get paid (The vendors reference here are the ones selling the ISDRA permits in CA and AZ).	Addressed in plan.
20. Require vendors to sell permits for free.	This idea was considered but eliminated because BLM does not have the authority to require vendors to sell permits for free.
21. Require ISDRA vendors to sell permits.	BLM would not require all vendors to sell permits. BLM would select which vendors are authorized to sell permits to ensure fiscal responsibility.
22. The cost to administer vendors comes out of their percentage (the fee contractor's revenues).	This idea was considered but eliminated because the contractor could increase the cost to the agency thereby making this a mute issue.
23. Charge more for holiday weekends.	This idea was considered but eliminated because BLM addressed this in the 2003 business plan. The latest surveys indicate about 50-60% of the visitors would shift their visitation patterns if charged more for holidays (Haas, 2008). This idea could cost more for families who traditionally visit on holiday periods and have no other visitation alternatives. This could create increased costs and workloads on the non-holiday weekends. For simplification and consistency, BLM will provide alternatives in this plan for short term permits valid for one week.
24. Charge more for developed areas.	In 1999, there were fee and free areas in the ISDRA based on this idea. After one year, the historical visitors to the free area requested that fees be added due to poor visitor experiences as a result of overcrowding. Due to the increased complexity and cost to administer a program where each area has different price to visit, and previous experience, this idea was considered but eliminated.

Idea	BLM Response
25. Provide discounts for local residents.	Addressed in the alternatives through providing free periods for all ISDRA visitors throughout the year.
26. Provide senior discounts.	Addressed in the alternatives through providing free periods for all ISDRA visitors throughout the year. BLM does not provide senior discounts for the purchase of individual non-commercial special recreation permits.
27. Expand off-site sales. (Bureau of Land Management, 2011)	BLM has expanded off-site sales to 80% of total sales and could continue to maintain off-site sales in the proposed alternative.

Authority

The BLM collects fees under the authority of the Federal Lands Recreation Enhancement Act (FLREA, Public Law 108-447, Dec. 8, 2004). As described in FLREA, Section 3(h), BLM has the authority to collect Special Recreation Permits for motorized recreational vehicle use. Subsequent to FLREA, BLM must comply with 43 Code of Federal Regulations (CFR) 2930 (Bureau of Land Management, 2011) which regulates fee collection for the BLM. Internally, BLM utilizes the 2930 Recreation and Permits Manual and the H-2930-1 (Bureau of Land Management, 2006) Recreation Permit Administration Handbook (Bureau of Land Management, 2006) for guidance at the field level.

Process

Following is a general outline of BLM's recreation fee review and approval process. This process applies to adjustments made to the existing individual non-commercial special recreation permits sold for the ISDRA. This process does not apply to commercial vendor fees. State Directors and Recreation RAC (RRAC) / Resource Advisory Council (RAC) members will develop the details of State-specific processes, but in general the process includes the following:

- 1. Field Offices develop proposals to present to the RRAC/RAC, which may include: A. Business plans.
 - 1) Description of the new recreation fee area or proposed fee adjustment.
 - 2) Financial analysis.
 - 3) Analysis of existing private and public facilities or services, including fees charged.
 - 4) Description of how the unit will inform the public about expenditures.

¹ In the case of the California Desert District, the RAC is the Desert Advisory Council (DAC)

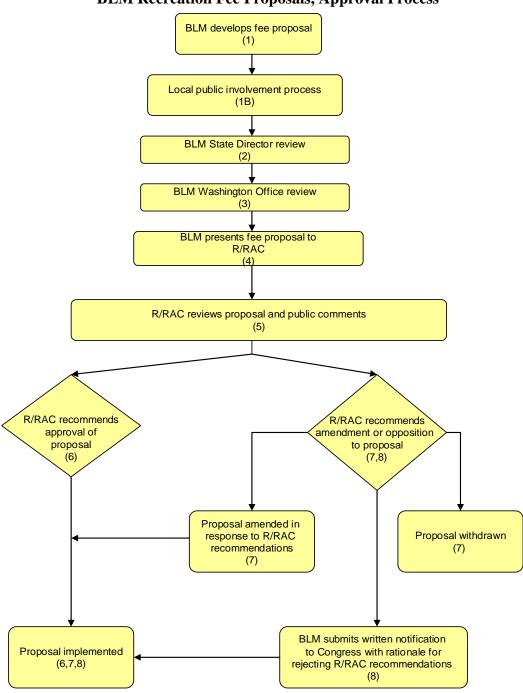
B. Public involvement

- 1) Fee proposal notice (general public outreach).
- 2) News stories or paid ads in local media.
- 2. Field Offices present proposal to State Director, or designee, for review.
- 3. If the State Director, or designee, approves of the proposal, it then goes to BLM's National Recreation and Visitor Services Division for review.
- 4. National Recreation and Visitor Services Division reviews proposal and, in consultation with the Field, determines if the proposal is sent to RRAC/RAC for recommendation.
- 5. RRAC/RAC makes recommendation.
- 6. If the RRAC/RAC recommendation matches or affirms the proposal, the proposal can then be implemented.
- 7. If the RRAC/RAC recommends a modification to the proposal and the State Director, or designee, agrees with the recommended modification, the proposal can then be implemented (or it can be withdrawn).
- 8. If the RRAC/RAC recommendation does not affirm the proposal, the State Director, or designee, must determine if the Field Office would still like to move forward with the original proposal. If the State Director, or designee, wishes to pursue the original proposal, the National Recreation and Visitor Services Division will coordinate with the Field and Department of Interior to issue the Federal Land Recreation Enhancement Act required written notification to Congress for rejecting the RRAC/RAC recommendation.



View of night OHV recreation at Oldsmobile Hill in the ISDRA. Photo by Gene Blevins / Sand Sports Magazine

BLM Recreation Fee Proposals, Approval Process



Area Description

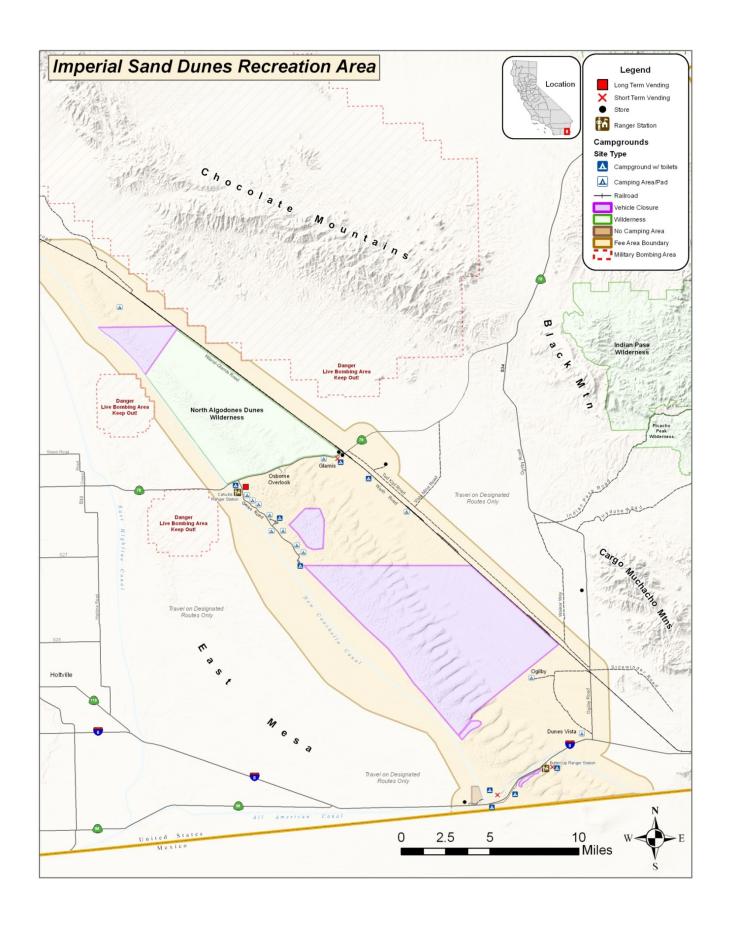
The Imperial Sand Dunes Special Recreation Management Area is considered a world-class OHV area and represents one of the most popular OHV areas in the United States. It is a well-known area to local residents and the thousands who visit each year from the southwestern United States and beyond. The ISDRA is the most heavily and intensively visited OHV recreation area on public lands managed by the BLM with over 1.2 million OHV visitors per year. Visitation levels fluctuate tremendously, from almost zero (0) during the summer to almost 200,000 during Thanksgiving weekend. The overwhelming popularity and regional importance of the ISDRA to visitors, recreational enthusiasts, and others require careful management to protect its recreational, natural, and cultural resources. As the designated steward of the ISDRA, the BLM El Centro Field Office is charged with the responsibility to oversee and manage this public treasure.

ISDRA is managed by BLM California Desert District, El Centro Field Office. It comprises approximately 164,209-acres contains the largest mass of sand dunes in California, covering an area more than 40 miles long and averaging 5 miles in width. It is located on the eastern edge of Imperial County and lies in a northwest to southeast direction. The Coachella Canal defines the western boundary and the Union Pacific railroad delineates the eastern edge of the ISDRA. The northern most area is known as Mammoth Wash. South of Mammoth Wash is the North Algodones Dunes Wilderness established by the 1994 California Desert Protection Act. The largest and most heavily visited area begins at Highway 78 and continues south just past Interstate 8 to the Mexican Border. This area encompasses the Glamis and Gecko areas near Highway 78 and the Gordons Well (Dunebuggy Flats), Grays Well (Buttercup), and Ogilby areas near Interstate 8.

Recreation Opportunities

Currently, as a result of a negotiated settlement agreement between the BLM and a coalition of environmental groups, several areas of the ISDRA are administratively closed to all vehicles to protect various species. Until a new Recreation Area Management Plan / Environmental Impact Statement / Record of Decision are completed and approved by the court, the following acreages are available for recreation opportunities:

	Acres
Open OHV recreation	88,804
Administratively Closed (no OHV)	49,307
North Algodones Dunes Wilderness (no OHV)	26,098
Total ISD SRMA	164,209



The designated fee area includes all public lands in the ISDRA and an additional 50,722 acres. This area is comprised of a one mile fee boundary that extends beyond the ISDRA. This boundary was established in order to maintain normal geographical visitation patterns around the area. Historically, most of the visitors that recreate in this area utilize the recreational resources in the ISDRA.

Special Recreation Management Areas (SRMA)

The BLM identifies SRMAs where the resources of the public lands attract visitors from one of the three following recreation markets:

- Public lands with a demonstrated *community* recreation—tourism market would be managed as a Community SRMA. A Community SRMA is managed in collaboration with the local community to primarily benefit the local residents.
- Public lands with a demonstrated *destination* recreation—tourism market would be managed as a Destination SRMA. A Destination SRMA is managed as a regional or national destination through collaborative partnerships.
- Public lands with a demonstrated *undeveloped* recreation—tourism market would be managed as an Undeveloped SRMA. An Undeveloped SRMA is managed to maintain dispersed and undeveloped recreation opportunities.

The ISDRA is managed as a Destination SRMA with a primary activity of OHV recreation and associated vehicle camping. The ISDRA is one of the last areas available that provide an opportunity for vast open OHV sand dune recreation in the southwest United States.

Description of level and types of development in the recreation area

Mammoth Wash Area

The Mammoth Wash Area is located in the extreme northwest end of the ISDRA. It is bordered on the north by private land, on the south by the North Algodones Dunes Wilderness, on the East by the Rail Road, on the west by the Coachella Canal. The remote access serves as an attraction for some who desire a more semi-primitive motorized recreational opportunity. OHV recreation at Mammoth Wash is light with estimates of 10-15 groups utilizing the area on major holiday weekends. OHV recreational activity during the week is minimal, with many weekdays with no OHV visitation.



Hikers in the Wilderness having some fun with shadows.

North Algodones Dunes Wilderness

Activities in the North Algodones Dunes Wilderness include photographic activities, sightseeing, walking, hiking, backpacking, camping, nature study, horseback riding, hunting, and wildlife viewing. No mechanized vehicles (OHVs, motorcycles, bicycles, hang gliders, motorized equipment, or motorboats) are allowed. Primitive camping is available. On both non-holiday and holiday weekends the level of use is low. A Watchable Wildlife Site is available to visitors on the east side of the wilderness. It has an informational kiosk, interpretive panels, and a parking area to access the wilderness.

Gecko Road Area

The Gecko Road Area lies immediately east and west of Gecko Road. It includes Gecko Road, all the adjacent pads and campgrounds, and the Osborne Overlook area. Cahuilla Ranger Station is located adjacent to Gecko Road just south of Highway 78. The station is the focal point of the entire ISDRA operations and is a designated location for visitors to seek assistance. A trash collection facility and toilets are located just south Cahuilla Ranger Station and are accessible to all visitors.

Along the eastern boundary of the Gecko Road Area and the western boundary of the Glamis Area are

dunes that are considered by some to be the best OHV area in the ISDRA. The area consists of large and steep bowls that can be traversed from one to

another by crossing over razor back ridges. OHVs can reach high speeds while the centrifugal force holds them to the face of the bowl as they drive around the bowl.

There are eight hard packed, BLM constructed, camping areas along Gecko Road. From north to south, they are named Cement Flats, Pad 1, Pad 1½, Pad 2, Pad 2½, Pad 3, Pad 5, and Pad 4. There are no other amenities at any of these sites, except at Cement Flats, which has a vault toilet.

There are three asphalt loop campgrounds that extend from Gecko Road. Gecko Campground consists of two main loops and Roadrunner Campground is located at the end of Gecko Road and consists of an asphalt loop. Both Roadrunner and Gecko Campgrounds have pit toilets. The Keyhole campground is located just north of Roadrunner Campground and consists of one asphalt loop with no other amenities.

Osborne Overlook is located approximately two miles east of Gecko Road and south of Highway 78. There is a short access road that leads to a rough hardened surface overlook. There is a post and cable fencing surrounding the edge of the surface, a shaded picnic table, and a dedication monument at the site. Camping and day use parking are available.

Glamis Area

The Glamis Area is located south of Highway 78 and west of the railroad. The area adjacent to Highway 78 and Glamis is flat, sandy and is a favorite camping spot for thousands of dunes enthusiasts. This area is used for camping, OHVs, and commercial vending.



Visitors congregating in large crowds.

Glamis has become the main area for visitors to purchase goods and services from vendors and local private businesses. The permitted vendors have historically used a specific area and pattern to setup for sales. This area has become known as "Vendor Row" or "The Mall". During peak periods, this area can experience intensive OHV traffic.

Camping in this management area takes place in the natural flat hard-surface pockets and up to the fringes of the dunes. Camping occurs in large groups that form "wagon circles" of recreational vehicles that creates an atmosphere for visiting with friends.

Ogilby / Dunes Vista Areas

The Ogilby / Dunes Vista Areas are located in the southeast corner of the ISDRA just north of Interstate 8. It is bordered on the North by Pilot Knob Mesa, on the south by Interstate 8, on the East by the Ogilby and Ted Kipf Roads, and on the west by Patton Valley. The Ogilby Area is a popular OHV area for families and groups that seek a roaded natural recreational opportunity, and camping at a site away from the intensively used areas of the ISDRA.

OHV recreation in the Ogilby / Dunes Vista areas are minimal during weekdays, with many weekdays during the use season (October-April) with negligible OHV or other recreational visitation. This primitive camp is a popular site utilized by families and groups that prefer camping in an area that receive low to moderate OHV recreational activity.

Dune Buggy Flats Area

The Dune Buggy Flats Area is located north of Interstate 8 along the western border of the dunes and north of Interstate 8. This area is used for camping, OHVs, and commercial vending. The Dune Buggy Flats area provides open dispersed camping in a hard packed flat area. The main area is bordered on two sides by irrigation canals. This area has seen an increased level of visitation and activity since the implementation of the

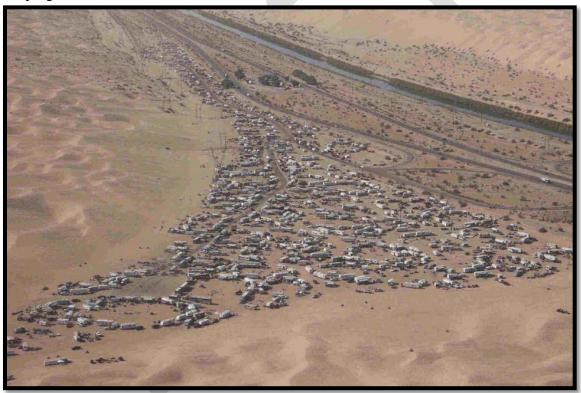


Typical "Wagon circle" camping in the ISDRA.

fee program and is accessed from the Gordons Well exit off Interstate 8. The majority of the camping occurs east of the New Coachella Canal. Vault toilets are provided near the access road. The area west of the canal and within the Area of Critical Environmental Concern was closed to camping in 2001 as mitigation for the construction of the Herman Schneider Memorial Bridge. This bridge created a safe and legal route of travel for OHVs between the Buttercup and Dune Buggy Flats Areas.

Buttercup Area

The Buttercup Area is located south of Interstate 8 to the US / Mexico Border and is used for camping, OHVs, site seeing, commercial vending, education, filming and rights of way. Camping occurs along many points of Grays Well Road, the main access road that runs parallel to Interstate 8. The main camping areas in this management area are the Aguilar Road, near the Plank Road, Midway Campground, and Grays Well. All of the above sites have vault toilets, trash dumpsters, and hard packed camping space for camping



Camping in the Buttercup area.

and OHV access. Buttercup Ranger Station is located near the Interstate access and serves visitor to the area and is staffed by BLM and volunteers.

The major OHV destination point in this management area is Buttercup Valley Competition Hill. On the north end of the valley, OHV enthusiasts use the steep leeward side of the dune for challenge and competition for man and machine.

The Plank Road Historical Site lies just south of Grays Well Road and approximately midway between the ends of the road. There is a portion of the road that is protected with fencing and there are several interpretive panels. The Plank Road is a destination-site for tourists and passing motorists.

Fee Area adjacent to ISDRA (Outside ISDRA recreational boundary but within the fee area boundary)

The fee area extends one-mile beyond the perimeter around the ISDRA boundary to the west, east and north. The three management plans covering these areas are the Imperial Sand Dunes Recreation Area Management Plan (RAMP), the Western Colorado Desert (WECO) and the North Eastern Colorado Desert (NECO). The purpose of this fee area is to reduce the impacts of activities related to the ISDRA on lands outside the ISDRA boundary. Lands surrounding the ISDRA are currently managed as limited access or closed. The area encompasses sand and gravel mining, military bombing ranges, private lands, habitat areas for the desert tortoise and management areas for the flat-tailed horned lizard. It is used for OHVs, camping, hunting, and military exercises.

The fee area northeast of the railroad tracks, near Ted Kipf Road, experiences relatively low visitation. Recreation activity that does occur is limited to the existing roads and trails.

Visitor Demographics

Since the completion of the previous business plan, there have been three visitor studies in the ISD SRMA. During the last decade the visitors to the ISD have remained to be predominantly male, visit the dunes to recreate on OHVs, and are satisfied with their recreational experience. The following statistics are excerpts from the most current studies.

- ❖ ISDRA Visitor Survey (University of Idaho, 2011)
 - Visitors to the ISD SRMA are 69% male and 31% female.
 - > 35% of camping groups have children 12 and under.
 - ➤ 22% of camping groups have teenagers ages 13-17.
 - The majority of the visitors (76%) are 31-60 years old.
 - ➤ 63% thought fees charged were "About right".
 - > 25% thought fees were "Too high"
 - ➤ Motorized recreation vehicles (86%) and Camping (72%) were listed as the two highest primary activities.
 - ➤ 82% of visitors were satisfied overall with facilities, services, and recreational opportunities.
- ❖ ISDRA visitor's willingness to pay a fee to recreate decreases as price increases. However, results are interpreted with caution due to a low response rate to these questions in the survey (Powell, 2011).

❖ Although results varied across different camping areas in the ISDRA, about 40% of the visitors would change the time they visited the ISDRA if the fees were \$30 for a regular weekend, \$60 for holiday weekends, and \$180 for a season permit (Haas, 2008).

Recreation Use

Type, season, duration, and intensity of visitor use

The ISDRA is located within a three-hour drive from Los Angeles, Orange County, Riverside, San Diego, and Phoenix. The ISD SRMA is a highly valued and unique recreation resource within the southwestern United States for two reasons: 1) it is a sand dune ecosystem of a size and height unparalleled and 2) it fills a unique and valued niche for providing the largest acreage of dune-oriented, motorized recreational opportunities in the United States. The ISDRA has far more acreage than the 10 other dune areas that are located within 1,500 miles.



Continued population growth in Southern California, the expanding popularity of OHV recreation (108% increase since 1980 in California), and a decrease in the acreage available to OHV recreation in the California Desert (California State Parks, 2002), has resulted in a steady increase in visitation within the ISDRA until 2006.

The ISDRA provides for many types of recreational experiences, with OHV recreation as the dominant activity. The OHV enthusiasts who visit on holiday weekends will experience large crowds, noise, and intensive, 24-hour OHV activity in areas such as Glamis, Gecko, Dune Buggy Flats, and Buttercup. There are other locations within the ISDRA where OHV recreation is less intense on holiday weekends and visitors can



have a quieter, less intensive experience (Mammoth Wash or the Ogilby areas). The majority of the opportunity lies during weekdays and non-holiday weekends when a range of recreational settings can accommodate many different types of experiences.

The ISDRA is managed to provide both non-motorized and motorized recreational opportunities to area residents and visitors. In addition to OHV recreation, the ISDRA provides other recreational opportunities including hiking, horseback riding, wildlife and

scenery viewing, picnicking, photography, nature study and environmental education, camping, sightseeing, and driving for pleasure. The ISDRA also provides a special niche that produces a particular social experience. It provides wide-open spaces where enthusiasts can seek solitude or a substantially modified natural environment with facilities for a highly intensified motorized recreation experience.

The types of vehicles that are used within the ISDRA include OHVs and street-legal vehicles. The vehicle types that can be found include: sand rails, dune buggies, all-terrain vehicles, recreational off-highway vehicles (ROVs), motorcycles, 4WD pickups, 2WD pickups, sport utility vehicles, and custom built off-road vehicles.

The earliest known annual visitation within the ISDRA was 150,000 in the late 1970s; the number of visits had increased to 225,900 visits in 1985 (Bureau of Land Management, 1987). Table below shows the estimated annual visitation within the ISDRA for fiscal years 2004 through 2009.



ISDRA VISITATION, FY2004-FY2011

Fiscal Year	Visitation
FY2004	1,372,630
FY2005	1,392,389
FY2006	1,464,580
FY2007	1,457,685
FY2008	1,376,394
FY2009	1,312,526
FY2010	1,280,535
FY2011	1,133,132
Average	1,348,734

Table 1 - Visitation numbers were collected from magnetic vehicle counters then generated by multiplying vehicle counts by 3.5, the average occupancy per primary vehicle. A visit occurs when one person visits BLM lands to engage in any recreational activity, whether for a few minutes, full day, or more.

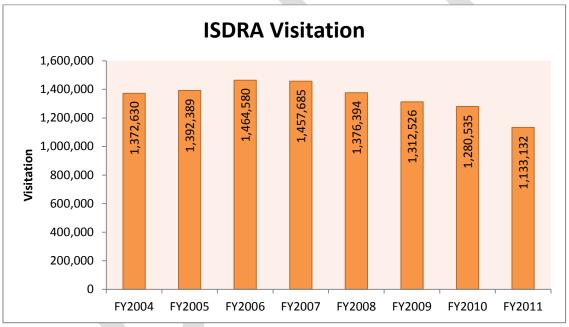


Figure 1 - Visitation peaked in 2006 but has declined at a lower rate than fee revenues.

Average annual visitation for fiscal years 2004 through 2011 was 1,348,734 visitors, with peak visitation between October and April. The visitation levels for the ISDRA peaked in FY2006 and have declined each subsequent year, likely due to the weak economy and the decline in disposable income.

Visitation is unevenly distributed throughout the year, with the highest visitation occurring during four holiday weekends (Halloween, Thanksgiving, New Year's, and Presidents' Day). The visitation estimates for the major holiday weekends often exceed 100,000 visitors. For example, the visitation during Thanksgiving weekend for fiscal year 2011 was 146,000. During approximately 25 percent of the recreation season (i.e., two out of eight months in the season), 35 percent of the annual visitation occurs.

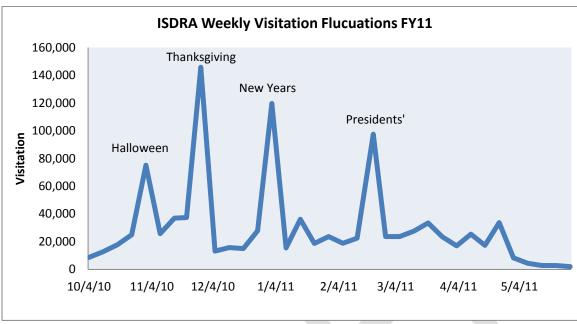


Figure 2 - This graph displays the significant visitation swings during the winter holiday weekends when significant expenditures occur in the program.

It is common for a camping party to consist of three or four generations of relatives who have been visiting the area over the years. These return visits provide a sense of tradition, nostalgia, history, intergenerational bonding, and a sense of place attachment.

The ISDRA is open to the public year-round. However, due to high temperatures during the summer months, the recreation season is generally considered to be October 1 through Easter of each year.

The peak use on the holiday weekends results in a change in several important social and managerial attributes of the setting, which then leads to a change in the recreation opportunity being provided. This change is consistent with the ISDRAs unique and valued niche of providing a wide spectrum of recreation opportunities.

Cost Recovery or Fair Market Value Assessment

During the development of new fee rates, BLM will follow the guidance provided in Manual 2930:

"Recreation fees are used to provide needed public services while protecting and enhancing public lands and recreation opportunities. Fees should be balanced and affordable for all members of the public, should not be an impediment to visiting public lands, and should not be used as a means to affect the allocation of recreation opportunities. However, those persons actively using recreation opportunities should make a greater, but reasonable, contribution to protect and enhance those opportunities than those who do not use these opportunities.

The BLM collects recreation fees at all recreation-sites which meet fee collection guidelines as provided for in REA. The collection of recreation fees supports the

Department of the Interior's 2007-2012 Strategic Plan Performance Goal "To Provide for and Receive Fair Value in Recreation" and conforms to the BLM's "Priorities for Recreation and Visitor Services" strategic plan. Fee programs should support protection of natural resources, provide for public health and safety, and facilitate access to public lands.

Recreation fees are one part of a comprehensive funding strategy to support recreationsites and services. Other elements of the funding strategy include appropriated funding (as a primary funding source), volunteer assistance, interagency cooperation, grants, partnerships with the private sector, commercial operations, and leveraged funding. Fees are not used to maximize revenue."

Two different calculation methods can be used to develop a rational for an amendment to the current fee collection schedule:

- Cost Recovery Method- The adjustment of fees to cover the cost of operations and maintenance.
- Fair Market Value Method The adjustment of fees based on competition in open markets for similar recreation opportunities.

This plan will consider both methods and develop proposed fee rates. If the two methods produce significantly different rates, BLM's proposed alternative must recover the cost of managing the ISDRA. This could be accomplished by either increasing the fee, reducing the expenditures, or a combination of both. BLM will solicit public comments on the proposal then make administrative changes if warranted.

Financial Analysis

The following section describes the costs to manage the ISDRA, revenue sources, the alternative methods considered for fee collection, the alternative fee amounts to charge visitors, and the proposed alternative for a fee amount in ISDRA.

The BLM is currently operating with an annual fee budget of \$2,595,000 (FY 2011), but estimates a need for an annual budget of \$5,000,000² to \$7,000,000 in order to provide a high level, quality services to the ISDRA visitors. The \$2,000,000 variance would be dependent on the type fee collection cost (up to \$1,000,000) and federal funding that could be needed to implement biological monitoring studies during years of significant rainfall events. It is unknown what these monitoring projects will cost and how frequently they will occur, however, they have cost up to \$1,000,000 per study in the past and could occur every five to ten years.

The 2003 ISDRA Business Plan identified an annual budget of \$6.1 million dollars to manage the dunes. This estimate was based on the 2003 Recreation Area Management Plan high priority action items and higher levels of visitation. Medium and lower priority action items were not allocated funding in order to keep the cost of the permits within a market rate. These unfunded and lower priority items provide an opportunity for BLM to

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² The funding amount in alternative two (\$5,500,000) is the estimated cost to effectively manage ISDRA.

apply for grants and develop partnerships to complete these management actions and keep direct costs to the visitors to a minimum.

The 2003 Business Plan was also based on a 50% fee compliance rate and included plant monitoring for 1.1 million dollars. Since then, the passage of FLREA has prohibited the use of fee dollars for monitoring, fee compliance has increased to over 90%, and many other changes have occurred. Over the years, the fee program has generated about one half of the revenues needed to manage the dunes as identified in the 2003 Business Plan. BLM has attempted to make up the funding shortfalls through federal dollars, grants, partnerships, increased efficiency, and reducing services to manage a balanced budget.

<u>Imperial Sand Dunes Recreation Area – Revenue Sources</u>

ISDRA management is funded through several sources: federal (appropriated) funds, grants, partnerships, and recreation fees. Federal funding can vary year to year, and has averaged over \$850,000 from FY 2009 through FY 2011. This amount includes all aspects of management including, but not limited to, recreation management, natural and cultural resource monitoring, EMS/Search and Rescue, facility maintenance, planning, and law enforcement. Deferred maintenance funding for facilities, such as road construction and ranger stations, can be highly variable year to year and is dependent upon specific project funding. Federal funding is used to accomplish natural resource monitoring which cannot be paid for with fee dollars since it is prohibited by the Federal Lands Recreation Enhancement Act (FLREA). BLM is projecting funding to decrease and that the current levels will not be sustained for the long term. Annual federal funding has varied substantially over the last several years. The current average above includes a few large maintenance and construction projects that were funded during the last few fiscal years. This plan will use \$500,000 as the amount to plan for annual federal funding.

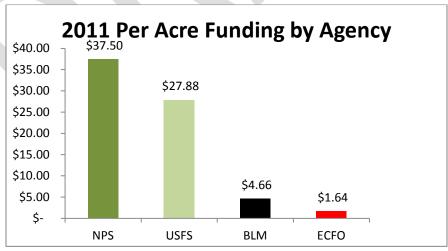


Figure 3 - ISDRA is approximately 164,000 acres. The El Centro Field Office is funded at \$1.64 per acre. At this level of funding, ISDRA could receive about \$270,000, however BLM is committing to \$500,000 per year to maintain a high level of support from the El Centro Field Office and to reduce fee expenditures for visitors.

The BLM applies for annual grants. The main source of grant funding is the CA State Parks, Off-highway Motor Vehicle Recreation Grants Program. Applications vary, but regularly include requests for EMS / search and rescue, education, restoration, and law enforcement. Each year, it is unknown if applications have been successful and will be funded for the next fiscal year. In addition to this uncertainty, grant funding in the State program has been reallocated reducing the amount available to applicants. For this business plan, grant funding cannot be relied upon as a regular source of income.

Although BLM partners and volunteers do not generate direct cash revenues, they play an important role in the ISDRA. Partners and volunteers improve visitor satisfaction, education, and safety through innovative measures. They increase program efficiency and complete actions that the BLM would not be able to complete alone. However, since these programs do not generate direct revenues, and usually provide "Nice to have" instead of "Need to have" services and items, they will not be utilized as a main funding source for this analysis.

The fee program constitutes the majority of the revenue to fund operations in the ISDRA. Revenue levels peaked at \$3,356,612 in FY 2009 after the addition of the on / off-site fee program. Since that time, revenues have decreased due to a reduction in the amount of permits sold and an increase in the off-site permit percentages. In FY 2011, the total revenue for ISDRA permits was \$2,459,507. After the cost of collection (\$899,000 in FY 2011), the majority of the fees are used to provide, visitor services, EMS / search and rescue, maintenance, law enforcement and cover overhead costs. The average revenue during FY 2009 through FY 2011 has been \$2,888,000.



Figure 4 – Fee dollars provide search and rescue to over 400 visitors per year.

Alternative plans (Costs) to manage the ISDRA

Three management alternatives have been developed for the dunes. These amounts are based on basic funding levels and do not include developments or new facilities or services in the ISDRA. Each of these alternatives offers a basic level of management that would increase or decrease, depending on the revenue alternative.

Alternative 1 (Proposed), \$3,618,840- Road and campground maintenance would increase over what is currently occurring and access would be maintained. Toilet cleaning would be done by BLM staff and the contract would not be renewed. Law Enforcement Rangers would be provided at the current levels and be adjusted as visitation fluctuates. Park Ranger (Rescue) staffing would be increased to previous levels and cover most of the visitation periods. Most emergency 911 calls would be addressed by BLM staff assisting the county. Fee collection would be managed by a non-profit "Friends" group through a contract. Even though this alternative is less than the amount estimated amount of funding needed, it is the proposed alternative because it keeps fees in market range and provides enough funding for the minimum basic operations. The ISRP fees to generate this level of funding would be:

Alternative 1 (Proposed) ³		
Permit Type	Off-site	On-site
Weekly	\$40	\$70
Season	\$180	Not available



Figure 5 - Damage to Wash Road, summer 2012. Fee dollars repaired this road and will provide camping access to over 200,000 visitors this year.

The off-site weekly amounts falls within the fair market value when compared to other sand dune OHV recreationsites (see appendix two). The off-site seasonal amount falls approximately \$40 above market value but provides cost recovery. The on-site weekly permit is above market value but provides cost recovery. The BLM has proposed this on-site amount to increase offsite sales and still provide the convenience of an on-site weekly

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³ See appendix one for the worksheets that develop the fee dollar amounts for each alternative.

permit at the ISDRA. The on-site season permit is being withdrawn from the fee schedule since it would not be consistent with management objectives.

Alternative 2, \$5,486,540 - Funding would ensure the best access and improvements to roads, campgrounds, and associated visitor facilities. Roads and camping areas could be maintained at a higher level an incrementally improved. Visitor facilities such as informational kiosks and signs could be increased and/or improved and updated. Trash collection and toilet services would remain at the current level. Outreach, education, and one on one contact with Park Rangers would increase. Emergency rescue services would increase on regular weekends and on winter holidays. Law enforcement would increase on regular weekends and on holidays. The fee program would continue to be managed by a private contractor. Visitor experiences in the recreation area are likely to become more positive and satisfaction is likely to increase. The ISRP fees to generate this level of funding would be:

Alternative 2		
Permit Type	Off-site	On-site
Weekly	\$70	\$100
Season	\$250	Not available

All amounts amounts fall above the fair market value when compared to other sand dune OHV recreation-sites (see appendix two) but provides cost recovery to provide high levels of quality services.

Alternative 3, \$2,776,760 - This alternative is near the current level of program funding. If this level of funding continues into the future, access to roads and campgrounds could be decreased due to road failures and deep sand covering some of the sites. Trash collection services would remain at the current level. Current road and camping area maintenance could be reduced or stopped. Law Enforcement Rangers could be provided. Park Ranger (Rescue) staffing could continue to be low. BLM could respond to emergency 911 calls when staff is available. However, there will be some calls where BLM is not able to assist the county due to funding and staffing shortfalls. Fee collection contract will expire and will not be renewed. Fee collection could be done by BLM temporary / seasonal staff. Visitor experiences in the recreation area are likely to become more negative and satisfaction is likely to decrease due to limited camping access, reduced EMS / search and rescue services, and reduced emergency law enforcement response. The ISRP fees to generate this level of funding would be:

Alternative 3		
Permit Type	Off-site	On-site
Weekly	\$35	\$50
Season	\$100	Not available

All amounts fall in the fair market value range when compared to other sand dune OHV recreation-sites (see appendix two) but do not provide cost recovery for basic management of the ISDRA.

The table below is a comparison of all three alternatives and where the proposed fee revenues would be spent.

Federal Lands Recreation Enhancement Act	Proposed Alternative	Alternative	Alternative
Expenditure Section	1	2	3
(A) repair, maintenance, and facility enhancement related directly to visitor enjoyment, visitor access, and health and safety;	\$575,700	\$1,064,400	\$328,700
(B) interpretation, visitor information, visitor service, visitor needs assessments, and signs;	\$950,640	\$1,098,640	\$692,560
the state of the s			, ,
(C) habitat restoration directly related to wildlife dependent recreation that is limited to hunting, fishing, wildlife observation, or photography;	\$0	\$0	\$0
(D) law enforcement related to public use and recreation;	\$1,405,000	\$2,056,000	\$1,255,000
(E) direct operating or capital costs associated with the recreation fee program; and	\$15,000	\$15,000	\$13,000
(F) a fee management agreement established under section 6(a) or a visitor reservation service.	\$500,000	\$1,000,000	\$350,000
(c) Administration, overhead, and indirect costs	\$172,500	\$252,500	\$137,500
Projected expenditures	\$3,618,840	\$5,486,540	\$2,776,760
10% Contingency	\$361,884	\$548,654	\$277,676
Total Projected Expenditure / Revenue Need ⁴	\$3,980,724	\$6,035,194	\$3,054,436
Annual Federal Funding	-\$500,000	-\$500,000	-\$500,000
Fee revenue needed	\$3,480,724	\$5,535,194	\$2,554,436

⁴ This amount does not include the biological monitoring that could be needed every five to ten years. In the past, this monitoring has cost up to \$1,000,000.

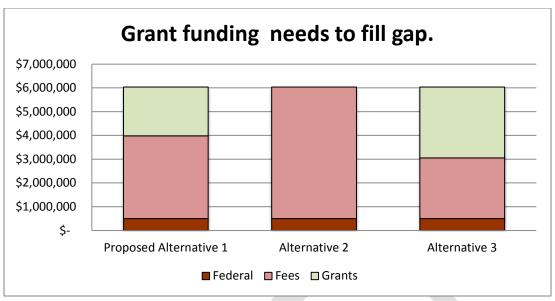


Figure 6 - This is a graphical display of how grant funding could help fill the funding gaps in alternatives one and three.

Common to All Alternatives

All alternatives could include a contingency amount of ten percent. The contingency could allow the BLM to budget for unforeseen and emergency expenses that occur. Examples from the past include, but are not limited to:

- Flash floods causing road damage which required significant road work to maintain access for the public.
- Extensive wind storms created significant workloads to keep the camping areas open and safe.
- Emergency rescue vehicles experienced mechanical breakdown and required quick repair to continue search and rescue operations.

All Alternative also propose free use within the ISDRA during the months of June-September each year. To support the local visitors, free use on one Sunday during the months of December and March, and one Saturday in January each year would be scheduled. This would allow three times during the season for free day use anywhere in the ISDRA.

This proposal is based on future needs, conditions, and changes that are difficult to determine at this time. In order to develop the proposal above, BLM assumed:

- 1. Permit sales will level off around 50,000 permits sold annually in the future.
- 2. 85% of the permits will be sold off-site. 79% were sold off-site in FY11.
- 3. Seasonal and weekly permits at 20% and 80% respectively.
- 4. Fee compliance will remain consistent at approximately 90%.
- 5. Commercial vendor permit revenues will generate revenues to be self-sustaining. (Commercial vendor permit pricing addressed in a separate section)
- 6. Vendor commissions will be maintained at the current weekly permit commission of \$2.50.

- 7. Workloads remain fairly consistent.
- 8. The cost of fee collection will be decreased to approximately \$500,000-\$600,000.
- 9. BLM will utilize approximately \$500,000 in federal funding.
- 10. Biological monitoring will be funded through federally appropriated funds when needed.

Rationale for Fee Changes

BLM is striving to provide quality visitor services and protect the recreation opportunities currently available in the ISDRA; however, the fee program is not generating enough funds to fully support basic operations. The BLM's management goals must be completed within the fiscal constraints of the fee program, particularly in light of the uncertain federal budget climate. Thoughtful prioritization of the agency objectives must occur because they may not all be addressed. The fee program must be updated to address the gaps between the agency objectives, customer needs, and the resources available. Without a change to the fee program, changes will occur to the program including, but not limited to, cuts in EMS / search and rescue, maintenance of roads and camping areas, education efforts, and law enforcement. These cuts could lead to the closure of roads and camping areas, emergency calls without a response from BLM staff, and a decrease in visitor safety and satisfaction.

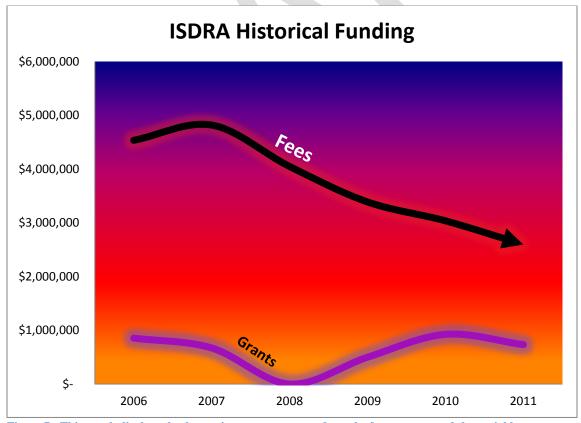


Figure 7 - This graph displays the decreasing revenue stream from the fee program and the variable grant revenues.

The 2003 ISDRA Business Plan based its expenditure estimates on the planned action items in the 2003 Recreation Area Management Plan (RAMP). After compiling the complete list of action items, the BLM prioritized them into three categories. The suggested collection rates in the plan would have only funded the highest of the three categories. It would keep the recreation area operational with a "bare bones" budget. This annual amount identified to manage the dunes at that time was over six million dollars.

At that time, fee compliance was low, there were no off-site sales, and BLM was managing under different Federal authorities. Since then, the "atmosphere" in the ISDRA has changed for the better. The agency has moved from a reactive to a proactive management program which has resulted in reduced medical incidents.

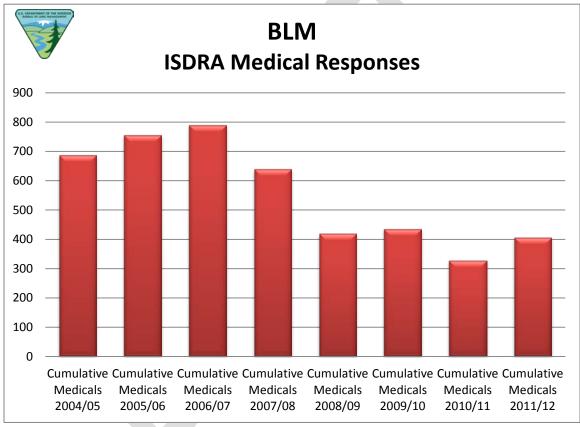


Figure 8 - This table displays the increase in safety that has occurred due to law enforcement and OHV safety education.

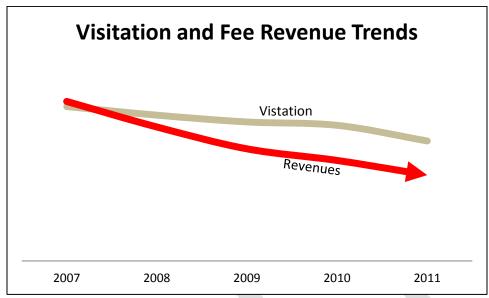


Figure 9 - This graph displays how revenues continue to decrease while visitation has begun to stabilize.

Preliminary 2012 visitor counts indicate similar numbers to 2011.

BLM made changes to more efficiently manage the area, tried to secure other sources of funding, and relied on partnerships to provide essential visitor services. However, the program is currently at a point where essential services are being reduced due to lack of available funding. For instance, the many of the access roads are in need of repair, the camping pads have not been properly maintained for several years causing visitor dissatisfaction, and rescues and law enforcement services have been reduced.

Since fiscal year 2007, ISDRA permit sales have continued on a downward trend and fee compliance is at an all-time high ranging from 88% to 91%. The reasons for the reduction in revenues are twofold. First, visitation has declined, thereby reducing permit sales (By 33% since 2007).

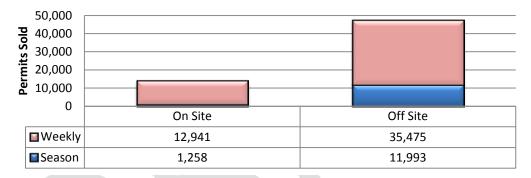
Secondly, the success of the off-site permit sales program has resulted in a further reduction of the revenues generated by permit sales. The off-site permit sales emphasis was to reduce on-site management costs, air pollution, traffic, to partner with the regional community, and improve customer service; BLM increased the cost of an on-site permit to promote a change in permit purchasing behavior. In FY 2012, off-site sales have increased to approximately 85%.

Since 1999, fees have been collected through a contractor or partner. On average, the contract rates have been about 30% of the revenues. In FY 2012, the contract cost for the management of the fee program may approach 40-50% because the contract is partially based on a flat service fee for fee collection. With a flat fee, as overall revenues decrease, the percentage of the fee collection contract increases. This business plan identifies alternative efficient models of fee collection and takes advantage of the previous success of the off-site fee program.

The revenues of the fee program cannot sustain the current levels of EMS, law enforcement and maintenance necessary for overall visitor safety. Grants and Federal funds have assisted the program in the past, however, funding is decreasing annually and the ISDRA needs to become financially self-sustaining or risk a significant and detrimental reduction in all services. Reductions in revenues would likely cause reductions in services including: closing major access roads and camping areas, closing vault toilets and removing trash collection could cause health and safety concerns, air quality could be degraded due to increased dust, and emergency services could be reduced.

The approximate annual ratio of season to weekly permit sales is 20% to 80%, respectively. However, only two percent (1,258 in FY 11) of the seasonal permits are sold on-site (see graph below). In order to encourage more off-site sales and further simplify the permit system, BLM is recommending discontinuing on-site season permits and only providing an off-site season permit option.

Permit Sales FY 2011



Fee Collection Alternatives

The alternatives below address different ways to collect fees in the ISDRA. Historically, BLM has utilized outsourcing to collect the fees through contracts and agreements. Fee collection had been done by hand, fee machines, on the phone, internet, at off-site retailers and on-site at the ranger stations, campgrounds, vendors areas, and main access points. Fees have been collected as visitors arrived, at the campsites, and as visitors left. Since 1999, when the fee program started, BLM has learned what has worked well and continually modifies fee collection to make it more efficient and effective. Compliance with the fee permit program has increased from an average of 26% to over 90%

No Action Alternative – The no action alternative would keep the fee collection system the same. It is currently contracted to a private company and includes several requirements including, but not limited to: on and off-site fee collection, vendor sales management, staffing the ranger stations, printing, website management and sales, phone sales, trade show sales, and roving sales. The contractor is required to strive for 80% of the sales to be off-site and for 80% fee compliance.

No Action Alternative		
Pros	Cons	
Staff hired by contractor to address workload.	High cost, (FY11, \$900,000)	
High percentages of compliance.		
Quality service to visitors.		
Quick turnaround for contract tasks.		
Evolves with technology.		
Contracts can be canceled at any time and contractors are not paid until the work is performed.		

Concessions Alternative – The BLM has the authority to manage areas under a concession contract. In a typical concessions contract, the term could be 15-20 years and the franchise fee (the amount retained by the agency) could be in the 2% to 10% range. The concessionaire manages all aspects of the recreation area except law enforcement. In the ISDRA it could include, all non-law enforcement staffing, maintenance, permit sales, and emergency medical services. Concessionaires usually include the revenues of retail sales in the recreation area and a concessions program could lead to all retail services and sales in the recreation area being conducted through the concessionaire with no BLM permitted vending allowed. A concessions program could lead to the ISDRA being more developed and a change in the recreation experience. There is a potential for the experience to be more like a visit to a developed national park where there are developed access points with visitor centers, assigned campsites, and a structured education and interpretive programs. Overall, a concession could move the recreation setting from semi-primitive to a more developed setting, thereby changing the experience.

Concessions Alternative		
Pros	Cons	
Could provide increased visitor services.	High cost (90%-98%) retained by the concessionaire.	
Could provide additional services and amenities like state and national parks (Interpretive and educational programs, retail gift shops, restaurants, lodging, etc.).	Could change vending opportunities and experiences.	
Could provide increased infrastructure development (Visitor centers, paved roads and campsites, tables, shade ramadas, etc.)	Would not provide enough funds to BLM to provide law enforcement services.	
Could provide a more structured environment and higher levels of control (Developed campgrounds, assigned sites, assigned fire rings, etc.)	High cost to visitors since a concessionaire would likely increase fees higher than the agency.	
	There has not been interest from concessions contractors.	

Assistance Agreement (Friends Group) Alternative- The BLM has the option to develop an assistance agreement with a non-profit "Friends" group to collect and manage the fee program. If this alternative were chosen, an assistance agreement would have to be bid like contract. The winning proposal would have shared project objectives with the BLM and a mutual interest in the program and outcome. Unlike contractors who work for the BLM, assistance agreement partners work together with BLM cooperatively (Northwest Procurement Institute, 2012).

Assistance Agree	ment Alternative
Pros	Cons
Partner works cooperatively with the BLM.	Funds would have to be made available to
Tarther works cooperatively with the BEW.	the partner in advance of the service.
Could reduce cost of fee collection.	More risk lies on the BLM because the partner can terminate the agreement at any time.
Staff hired by partner to address workload.	
Quality service to visitors.	
Quick turnaround for agreement tasks.	
Evolves with technology.	

BLM Alternative – BLM could manage the fee collection program with internal staff. A new fee collection staff or division would need to be developed and all associated equipment and supplies would need to be procured. BLM has policies and manuals to guide the agency on fee collection set up and security.

BLM AI	ternative
Pros	Cons
More BLM control of the fee program.	Approval and timeline challenges when utilizing government mandated services.
Could reduce cost of fee collection.	BLM may not have the authority to hire permanent staff to do the work.
Seasonal staff help cover workload.	More risk lies on the BLM.
	Increased staffing cost to BLM

Proposed Hybrid Alternative –BLM would contract for the parts of fee collection that provide the most difficult challenges to the agency, and are critical in nature, and BLM would hire a small seasonal staff to assist with permit sales at the ranger stations. The labor intensive, on-site permit sales would be removed from the contract which would reduce the cost of the contract. The BLM would contract the on and off-site vendor management, printing, and website sales. A seasonal staff of BLM visitor use assistants would staff Cahuilla and Buttercup Ranger Stations and sell the on-site permits.

Proposed Hyb	rid Alternative
Pros	Cons
Would reduce cost of fee collection.	No sales at some of the access points which could lead to a reduction in compliance, revenues, and customer satisfaction.
Risk is distributed to both the contractor	BLM permit sales would increase and extra
and BLM.	staffing may be needed.
Could provide similar services as no action	Shifts some of the cost of fee collection to
alternative.	the BLM.
More control of the BLM fee program.	
Off-site quality service to visitors.	
Quick turnaround for contract tasks.	
BLM can hire seasonal help to cover workload.	
Maintains commercial vending	
opportunities	
Increased revenues for BLM if some of on-	
site sales are collected directly by agency.	

Cost and security of collection

In the proposed alternative, the cost and security of collection would be incurred by the fee contractor for the sales required through the fee collection contract. Fee collected by BLM staff would be secured per BLM fee collection manuals and policies (Manuals 1372, 1384, 2930, handbook H-2930-1, and the BLM Collections Reference Guide"). In addition, BLM may need additional help during the busy holidays. The level of assistance varies per holiday and but averages about \$3,000 per person per holiday weekend if the person is not from the El Centro Field Office. BLM's goal is to keep the combined contractor and agency fee collection cost to about \$500,000 or less per year.

Compliance and Enforcement Capabilities

Fee compliance has increased to over 90% in the ISDRA due to the law enforcement staffs significant efforts. During the holidays, personnel from several agencies and locations are assigned to assist in the ISDRA. Together, the BLM maintains high levels of fee compliance in all areas in the ISDRA. Without the continued high level of support for the fee program by the Ranger staff, the fee program would not be successful.



Ranger on patrol in the ISDRA.

The high level of compliance is maintained in the ISDRA through active patrol and frequent contact with visitors. Visitors may be cited with either a federal or county citation if found to be in non-compliance. If unpaid, the citations may be abstracted to their registration through their state department of motor vehicles. Violators may also be cited multiple times with increasing penalties for subsequent violations. If citations continue to go unaddressed by the violator, a warrant may be issued for arrest.

Fee compliance data is developed by the BLM staff monitoring between 8,000-12,000 vehicles per season. While on patrol during weekends, holidays, and weekdays, vehicles are checked in the camping areas. Between the years of 2009 and 2011, off-site season permits averaged 44% of all vehicles checked but were only about 20% of the total permits sold. The FY 2012 compliance data collected so far is close to 50%. The discrepancy between the percentage of season permits sold and the percentage of season permits displayed might indicate that season permit holders visit more frequently than previous surveys have indicated or; some visitors could be transferring permits from vehicle to vehicle. In order to maintain high levels of compliance, season permits should have a way to identify the actual permit holder. A name written on the permit with a permanent marker could be a feasible solution.

Objectives for Use of Fee Receipts

The ISDRA fee program enhances public health and safety, facilitates access to the fee camping areas, and improves visitor amenities and services.

Public safety is provided through the expenditure of fee dollars on EMS / search and rescue, and law enforcement. Rangers enforce safety regulations and respond to injured visitors who request assistance through "911" emergency calls. Rangers respond to hundreds of rescue incidents each year.

Public health has improved through the expenditure of fee revenues on human waste management and refuse disposal. With over one million visitors per season, the BLM maintains 61 vault toilets and six trash disposal collection-sites. The installation, cleaning, and pumping of vault toilets, provides a sanitary and safe recreation area for visitors. These services, provided by fees have improved public health in the recreation area and surrounding public lands by providing a legal place to dispose of refuse and human waste.

Fees are critical to sustaining safe public access to the ISDRA. Due to the sandy environment, vehicles cannot travel very far off the improved paved and dirt roads. During winter weekends and holidays, camping space is a prime commodity and access to those areas is extremely important to visitors. In this windy environment, where sand continually covers and blocks road and camp areas, high levels of maintenance are needed to facilitate year round access.

Visitor amenities and services improvements change year to year. BLM has increased the services and infrastructure as described above during fee program implementation. OHV safety education programs have also increased and have received positive feedback from the visitors and special interest groups. OHV safety campaigns have been implemented through the use of partners and have helped to reduce the OHV accident rates over the past several years.



Figure 10 Fee dollars maintain 61 vault toilets throughout the ISDRA. Depending on visitation levels, maintenance has varied from \$100,000 to \$200,000 per year. The cleaning contract has been cut in 2012 due to funding shortfalls.

Social/Economic Impacts

Impact to underserved communities

In general, underserved communities are those impacted due to socio-demographic factors such as ethnicity, socioeconomic status, geographic location, educational attainment, disability, and age.

The following information is from a recent socio-demographic survey taken in the dunes (Haas, 2008).

Variable	Average (Range)	
Miles from ISDRA	205 miles (3-2800)	
Age	40 years (20-76)	
Gender	Gender	Percentage
	Female	28%
	Male	72%
Education	Level	Percentage
	< high school grad	1%
	HS grad or GED	21%
	Post-HS business or trade school	13%
	Some college	35%
	College grad	22%
	Some graduate school	4%
	Advanced graduate degree	4%
Ethnicity	Race	Percentage
	White	83%
	Hispanic, Latino, Spanish	13%
	American Indian or Alaskan Native	2%
	Asian	1%
	Other	1%
	Black or African American	0%
	Native Hawaiian or Pacific Islander	0%
Income	Category	Percentage
	Less than \$20K	1%
	\$20,000 - \$39,999	7%
	\$40,000 - \$59,999	16%
	\$60,000 - \$79,999	21%
	\$80,000 - \$99,000	23%
	\$100,000 - \$119,000	14%
	\$120,000 or more	17%

Per the data collected in the survey, the average ISDRA visitor is described as:

- White (83%),
- Male (72%),
- 40 years old,
- Drives 205 miles to get to the ISDRA,
- Has a high school education or higher (91%), and
- Earn more than \$40,000 (91%)

On average, each primary vehicle that visits the ISDRA spends \$1,182.37 per trip (Collins, 2007). At the current permit rates, visitors have the opportunity to purchase a weekly permit for \$25 per week, three percent of the average cost per trip. The Department of Health and Human Services poverty guidelines define poverty for a family of four at an annual income level of \$23,050 (Federal Register Volume 77, Number 17 Thursday, January 26, 2012, Pages 4034-4035). Seven percent of the ISDRA visitors have an average income between \$20,000 and \$30,000; and one percent of visitors have an average income of less than \$20,000 (Haas, 2008). If permits are increased to \$40 per week, it would be closer to 3% or 4% of the cost of an average trip, and would not have a significant negative impact to underserved communities traveling hundreds of miles to get to the dunes.

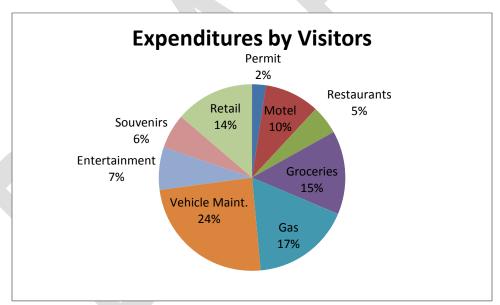


Figure 11 - This chart indicates the cost of a permit for the ISDRA visitor is 2% (\$28.40) of an average trip (\$1,182.37) to the Dunes. (Collins, 2007)

The majority of the visitors to the ISDRA describe themselves being of White ethnic background. The second largest ethnic group is described as "Hispanic, Latino, Spanish". The geographic location to large populations of Hispanic communities allows accessibility advantage to the ISDRA with relatively short driving distances. 80 % of Imperial County and 60% of Yuma County are of Hispanic or Latino origin (US Census, 2010). The proposed alternative is expected to benefit the local community through free visitation periods.

Seventy percent of the ISDRA visitors have post high school education and less than 1% is below the high school education level. Changes to the fee program proposed in the proposed alternative are not expected to significantly impact visitors with less education. Although BLM does not have statistics on the percentage of disabled visitors to the ISDRA, the 2010 U.S. Census reports that 19% of the U.S. population has a disability. In order to address the needs of this population, BLM has retrofitted facilities to improve physical access, develops web sites, displays, and educational materials for the hearing, sight, and physically impaired. The changes in the proposed alternative are not expected to have a significant impact to disabled visitors.

Ten percent of the visitors to the ISDRA are 61 to 70 years old and 3% are 71 years old or over (University of Idaho, 2011). The majority (76%) of the visitors fall between the age of 31 and 60. It is not anticipated that the proposed changes to the fee program would have a significant negative impact to people in this age group.

The majority of the visitors to the dunes do not fall into the underserved community description. However, through public feedback, the BLM has received requests to address the fee impact to the local visitors. Many have requested a local visitor discount or a day use permit. One percent of the visitors to the ISDRA are day use visitors (Haas, 2008). Most of the day visitors reside in the local communities of Brawley, Imperial, El Centro, Yuma, and other smaller Imperial County towns and cities. Within Imperial County, there are higher levels of persons of Hispanic or Latino origin (80.4%) and people below the poverty level (21.4%) (U.S. Census Bureau, 2011). In order to address the concerns of the local visitors and the underserved communities that reside in Imperial County, BLM would offer free visitation periods in the ISDRA in all alternatives.

Impact to local businesses

During October 2005 to May 2006, visitors to the ISDRA spent an average of \$1.66 billion on their trips (\$1,182.37 average expenditure times 1.4 million visitors) inside and outside the region (Collins, 2007).

It was estimated that the dollars spent gateway communities is between \$577 million and \$1.28 billion during October 2005 to May 2006.

Assuming visitors spend the majority of their dollars in the gateway cities, between:

- \$230.8 and \$513.2 million was spent in Brawley;
- \$150.0 to \$333.6 million in El Centro;
- \$52.0 to \$115.5 million in Blythe/Palo Verde;
- \$132.7 to \$295.1 million in Yuma.

BLM's current fee program benefits local and regional businesses. During the FY 2011 visitation season, approximately 80% of the ISDRA permits were purchased off-site through private commercial establishments. Many of these businesses are located in the gateway communities, along travel routes to the ISDRA, and in the outlying regional metropolitan areas of San Diego, Los Angeles, and Phoenix. Most of the businesses are off-highway vehicle stores and convenience / gas stations. These businesses use the draw of the permits purchase to



Several signs in the gateway communities like this can be found.

entice customers into their establishments. Anecdotal reports have been approximately 75% of the customers that enter businesses to buy an ISDRA permit also purchase fuel or other merchandise. These transactions increase the economic benefit to the establishment and the gateway communities through increased tax revenues. In addition to the merchandise sales, the businesses also are allowed to purchase the permits at a wholesale rate at 90% face value and gross 10% on each permit sale.

BLM plans to maintain the vendor sales program. Businesses regularly contact BLM to be added to the list of locations that sell permits. The current contractor and BLM discuss the strategic locations, business credit reports, and store hours before making decisions on locations to allow sales.

Visitor Feed Back Mechanisms

Visitors regularly provide feedback to the BLM through face to face conversations at the ISDRA, El Centro Field Office, and the many outreach events the BLM attends. The BLM also maintains a website where visitors submit questions and comments directly to the agency via a "Contact us" button.

The BLM works cooperatively with the Desert Advisory Council and the ISDRA Sub Group. The Sub Group represents the visitors to the ISDRA and regularly scheduled meetings are open to the public and have public comment periods. Minutes of the meetings are posted on the ISDRA Sub Group's web page for review.

Visitor feedback is also collected through surveys in the dunes. In 2011, BLM worked cooperatively with the University of Idaho to collect visitor satisfaction information. The following graphs are excerpts from the survey conducted that relate to the fee program.

The value of the recreation opportunity was at least equal to the fee asked to pay.

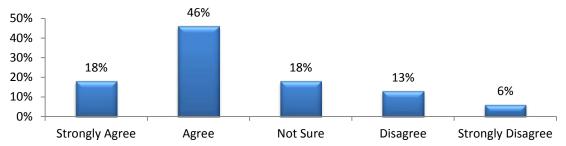


Figure 12 - The graph above suggest the majority of the visitors to the Imperial Sand Dunes feel the value of the recreation opportunity was equal the current fee. Visitors may not agree with an increase to the fee structure, however, it is needed to maintain the recreation opportunity.

How appropriate was the fee charged for this site/area?

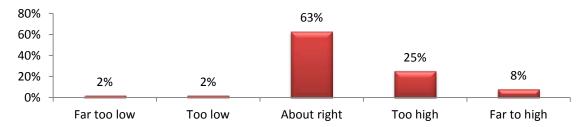


Figure 13 - The majority of the visitors feel the fees are about right, however 33% feel it is currently too high.

In addition to the University of Idaho survey, the following surveys and reports have also provided a feedback mechanism to the BLM about the ISDRA fee program:

- Tread Lightly! Evaluation 2011
- CA Recreation Fee Program Evaluation Government Accountability Office, 2008
- United Desert Gateway Visitor Profile, 2006
- ISDRA Technical Review Team Survey, 2005
- Government Accountability Office Recreation Fee Report, 2001

The table below is an example of a question that was asked in the 2006 survey to collect feedback from ISDRA visitors about differential fees. The idea of differential fees, and the price structure below, were proposed in the 2003 Business Plan but were not implemented. BLM dismissed the idea of differential fees for weekends in order to simplify the fee program.

Likelihood of Non-holiday New Fee Structure by Indi			-		
Likelihood that visitors would shift their visitation to non- holiday weekends given		Mai	nagement Uı	nit	
implementation of new fee structure: \$30 per week for non- holiday weekends, \$60 per week for holiday weekends and \$180 for a season permit.	Glamis (n=32)	Wash Road (n=85)	Buttercup (n=53)	Dune Buggy (n=62)	Gecko (n=57)
Not at all likely	17%	19%	6%	17%	21%
Moderately likely	27%	18%	28%	19%	19%
Somewhat likely	23%	21%	18%	27%	19%
Very likely	27%	20%	30%	15%	12%
Extremely likely	7%	21%	18%	22%	28%

Table 2 - There was variation across the management units on this question in the survey. Overall, roughly 40% of the visitors indicated they were very or extremely likely to visit on non-holiday weekends for \$30.

Public Participation

Public participation is an important part of developing the business plan to recommend fee changes in the ISDRA. Since the last business plan was completed in 2003, the public has had the opportunity to voice their concerns about the current fee program to the BLM through many avenues. Examples include, but are not limited to: direct conversations with BLM staff, e-mail, website, phone conversations, surveys, and through their representatives on several advisory councils. Feedback from the public has provided BLM the opportunity to make changes, adjustments, and improvements to the fee program with the support special interest groups and advisory councils.

The concerns of the Desert Advisory Council (DAC) ISDRA Sub Group were identified on August 31, 2010 and BLM conducted surveys to document visitor satisfaction levels prior to beginning the process of developing this plan. As the graphs above indicate, the majority of visitors feel the current level of fees is equitable, but many do not want to pay more. If fees are raised to support the continued operation of the ISDRA, visitor satisfaction, and fee compliance, is likely to decline. However, if the fee program is not modified to cover the current and future costs, visitor satisfaction would also decrease due to a reduction in in services and access provided in the dunes.

The public will also be afforded the opportunity to provide comments after the release of the draft business plan and when the plan is presented at the following meetings:

- DAC ISDRA Sub Group meeting,
- DAC meeting, and possibly the
- Recreation Resource Advisory Council meeting (The y currently do not have a meeting scheduled).

Stake Holder Input

Stake holder input is vital for the development of this business plan. BLM has been collecting and discussing ideas with ISDRA stake holders for many years. The Desert Advisory Council, ISDRA Sub Group has provided input and the BLM has utilized the DAC and Sub Group public meetings to solicit scoping issues prior to the development of this plan. BLM will continue to keep stake holders informed and they will continue to play a pivotal role throughout the development and implementation of this plan.

Communication Plan

Prior to the development of this business plan, BLM conducted scoping (outreach) through individual conversations with stake holders and through public meetings with the ISDRA Sub Group and DAC. After the development of this draft plan, the BLM will release it for public comment; brief the ISDRA Sub Group members, and Imperial County Board of Supervisors. The plan will also be published on the BLM web site and comments will be collected by e-mail. After reviewing the comments, and making adjustments, the BLM will prepare a final plan to propose to the Desert Advisory Council (DAC) or Recreation Resource Advisory Committee (RRAC) for implementation. Once Business Plan is completed and approved for implementation, some of the steps below would need to reoccur to advise the public what changes have been approved and when implementation is expected to begin.

Goals

The goal of this communications plan is to provide guidance and direction for communications and public involvement activities associated with the release of the Draft and Final ISDRA Business Plan.

Objective

The objective of this communication plan is to establish a clear consistent message to key audiences. The messages should be delivered in a timely manner so audiences have time to review the draft material to formulate well informed responses. After the approval final Business Plan, the objective will be to inform and educate the visitors of the upcoming changes that will occur.

Key messages and talking points

- 1. Without an increase in revenues, critical services will no longer be provided by BLM. Service that could be cut include, but are not limited to, maintaining access to camping areas, search and rescue, law enforcement, and critical maintenance services.
- 2. Permits have been available at the same rate since 2004 (nine years by FY 2014).
- 3. OHV grants are not a reliable source of funding for the ISDRA program.
- 4. Significant reductions in services are already occurring.
- 5. Increased efficiency measures have already occurred.
- 6. BLM must reduce the cost of fee collection but that could also reduce fee compliance and current conveniences.
- 7. Public participation is a key element of this planning process.
- 8. A new fee program needs to be implemented for the 2013-2014 visitation season.

Key audiences

- Internal Field Office, District, State Office, and Washington D.C. Staff and leadership must all be briefed and approve business plan prior to public release.
- ISDRA visitors
- Desert Advisory Council (DAC)
- DAC ISDRA Subgroup
- Imperial County Board of Supervisors
- California State Parks, Off-highway Vehicle Motor Vehicle Recreation Division
- Elected officials Congressional representatives
- Special interest groups American Sand Association, Off Road Business Association, California Off Road Vehicle Association, San Diego Off Road Coalition, California Association of Four Wheel Drive Clubs
- Partners United Desert Gateway, American Desert Foundation
- Private land owners adjacent to ISDRA
- Members of the press and industry magazines

Timing

- A. Week of October 9, 2012 briefing BLM District and CA State offices
- B. Week of October 9, 2012 briefing BLM Washington D.C. staff
- C. October 18, 2012 2012 Draft Business Plan posted to ISDRA website with links from Facebook. Mass e-mail sent out by BLM to notify of availability.
- D. October 18, 2012 Brief OHV leadership at BLM District office.
- E. October 23, 2012 Brief Imperial County at Board of Supervisors meeting.
- F. October 24, 2012 Brief ISDRA Subgroup.
- G. 8:00 am, November 5, 2012 Comment period on draft closed.
- H. November 5-9, 2012 Review comments, edit plan as needed. Produce final.
- I. December 1, 2012 Brief Desert Advisory Council (DAC)
- J. Unknown date, no meetings scheduled Brief Recreation Resource Advisory Committee
- K. January 2013 DAC recommendation on Business plan at first quarter meeting
- L. January 2013 Begin outreach and education regarding implementation.
- M. September 2013 Implementation of new fee structure.

Outreach venues

The 2006 ISDRA Visitor Profile indicates that 67% of the visitors prefer to retrieve information about the dunes on the internet so BLM will make it a priority to keep the webpage updated. In addition to the webpage, BLM will also advise and educate through:

- Camp contacts
- Ranger station contacts
- Calls to stake holders
- Attend stake holder meetings (as funding allows)
- Develop formal press release
- Social media outlets (ISDRA and partner Facebook pages)
- Mass e-mails

Questions and Answers

Why is it necessary to raise fees?

Revenues must be increased to maintain the current level of services. Without increased funding, services such as maintaining access to camping areas, search and rescue, law enforcement, and critical maintenance, could be reduced or completely stopped.

What are the proposed fees?

Off site weekly \$40, off site season \$180, and on site weekly \$70. June through September and three days during the season will be free.

Will there be any discounts available? Can I use my "America the Beautiful" pass? You could reduce the cost of your permit by \$30 by purchasing your permit off site. June through September and three days during the season will be free. The "America the Beautiful" pass, and all other Federal Recreational Land Passes are not applicable for discounts on individual Special Recreation Permits.

When would the fees take effect? The 2013-2014 recreation season.

How did BLM determine these fee rates?

The fees are based on cost recovery and the market rates.

What does it cost to manage the dunes?

Approximately \$5.5 million, however this plan proposes to operate the ISDRA with an annual budget of \$4 million. BLM is not proposing to raise \$5.5 million because it would increase the permit cost to an amount above market value.

Don't my taxes and green sticker dollars pay for management in the dunes? About \$500,000 federal dollars goes toward managing the dunes each year. Green sticker funding must be retrieved through grant applications each year. These applications are not a reliable source of income since they could be denied. When Green

sticker grants have been funded, they have paid for search and rescue, law enforcement, maintenance, and restoration of closed areas.

How can I voice my opinion?

You can e-mail isdrasubgroup@blm.gov, attend a Desert Advisory Council (DAC) meeting, a DAC ISDRA Sub Group meeting, or a Recreation Resource Advisory Committee (RRAC) meeting. For more information on these meetings please visit http://www.blm.gov/ca/st/en/info/rac/dac.html.

What is the process to raise fees?

In order to raise fees, BLM will prepare a business plan and propose the changes to the DAC or RRAC. If the change is not supported, the BLM can modify or withdraw the proposal, or explain to congress the rationale for rejecting the RRACs recommendations.

Has BLM considered a daily and second vehicle permit?

Yes, however it would increase management and enforcement costs so it is not recommended.

What do my fees pay for? Will there be site improvements?

Fees are the main source of funding to run dunes operations. After the cost of collection, fees pay for item such as search and rescue, maintaining access roads to the OHV camping sites, pumping and cleaning of vault toilets and other facility maintenance, trash collection, and law enforcement. Fees are also used as required "Matching dollars" to allow the BLM to apply for "Green sticker" grant funding. The proposed alternative would fund operations at a level to maintain what is currently developed. The proposed alternative would not raise enough funds for additional infrastructure development.

Where can I get more information about the fee program?

To read more about the fee program, please visit these web sites:

National information

www.blm.gov/wo/st/en/prog/Recreation/recreation_national/recreation_fees__.html

BLM California information

www.blm.gov/ca/st/en/prog/recreation/recpermit.html

ISDRA information

www.blm.gov/ca/isdra

Annual reporting

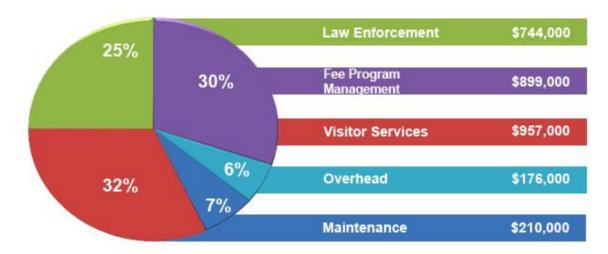
Per Section 804 of the Federal Lands and Recreation Act (c)(2), the use of recreation fee revenues in the ISDRA is posted annually at the site. It is also provided per guidance in the BLM Recreation Permits and Fees Manual section (2930.06B6j) and displayed on the ISDRA web page. The table, graph, and text below represent the FY 2011report posted in the ISDRA and on the web page.

Imperial Sand Dunes Recreation Area FY 2011 Fee Program Revenue = \$2,595,00	00
ISDRA Revenue	\$2,595,000
Carry-over from FY10	\$ 214,000
Unliquidated obligations*	\$ 281,000
Total FY11 Funds	\$3,090,000

^{*}Unliquidated obligations are funds that were set aside in previous fiscal years to pay for contracts that may run the course of several fiscal years. Essentially, it is carry-over funding tracked separately in the BLM system.

Total FY11 Expenditures: \$2,986,000

Carry-over to FY12: \$104,000



Expenditures included the following services for the 1,133,000 visitors to the dunes:

- Restrooms
- Trash Collection
- Road Maintenance
- Fee Collection
- Outreach & Education
- Emergency Medical/Rescue Services
- Law Enforcement
- Recreation Program Management

Priority projects for the next fiscal year will include maintenance, overhead, fee program management, visitor services and law enforcement.

ISDRA Fee Expenditure Categories:

Maintenance - Trash collection, restroom maintenance, road and camping pad grading, sand removal from road and campgrounds.

Overhead - Labor, training and travel.

Fee Program Management - Management and labor for permit program including on and off-site sales, website management, printing, mailing and vendor management.

Visitor Services - Emergency Medical/Rescue Services, dispatch, travel costs for holiday assistance, vehicles, education and outreach, maps.

Law Enforcement - Labor, vehicles and travel costs for holiday assistance.

Marketing Plan

BLM successfully utilizes the fee contractor to work together with the individual vendors to market the sale of permits for the ISDRA. BLM will continue a marketing program through a fee contractor in some alternatives. Individual vendors market their offsite sales and it is expected to increase each year if the proposed alternative is implemented. With the help of the BLM contractor, the vendors have developed signs, billboards, and advertise special sales to buy ISDRA permits before arriving at the dunes.



Marketing poster developed by BLM contractor to distribute to permit vendors.

Commercial Vending

The current vendor program expenses exceed vendor revenues and the program is unsustainable. Vending on public lands is allowed to enhance the recreation experience for visitors. Vendors must provide a service or products that enhance agency goals and objectives. This plan evaluates the vendor fee proposal through both fair market value and cost recovery. This proposal has been developed to ensure the sustainability of the vendor program.

About 100 vending permits are issued each fiscal year, the majority between October and May. The current vendor fees were adopted from the 2003 Business Plan and no longer cover the operation and management of the program. Currently, the vendor fees are:

Vendor Permit Type	Daily Rate
Mid-week	\$25
Weekend	\$30
Holiday Weekend	\$60

The El Centro Field Office issues a variety of special recreation permits (SRP). Vending is a type of SRP that is defined by the BLM Recreation Permit Administration Handbook (H-2930-1) as a temporary, short-term, non-exclusive, revocable authorization to sell goods or services on public lands in conjunction with a recreation activity.

Commercial Vending Financial Analysis

Program Expenses

The current vending program costs BLM approximately \$145,000 to manage. The expenses include, but are not limited to the labor, vehicle costs, on site operational expenditures, and miscellaneous administrative business costs.

BLM has developed the following alternatives that would sustain the vending program in the ISDRA. The alternatives below are based on "Vendor Days". A vendor day is one permitted day paid to the BLM for commercial operations on public lands.

No Action Alternative

In the no action alternative BLM would continue with the current vending program fees. The program would not be self-sustaining and would no longer be viable. The number of vendor days in this alternative is based on the paid days by all vendors in FY 2011.

Number of Vendor Days	Vendor Fee	Revenue
1,215	\$60	\$72,900
920	\$30	\$27,600
278	\$25	\$6,950
	Total	\$107,450

Fair Market Value Alternative

In the fair market value alternative the BLM proposes to charge the same rates a nearby business charges. This alternative would simplify the program by prosing flat rates for both short and long term vending. This would increase revenues to an amount that would generate surplus in the vendor fee program. Any surplus would be reinvested into the ISDRA. This alternative assumes that all four long term sites would be occupied and there would be 1,260 vendor days, a decrease from the current situation due to the increased cost for a permit. The number of vendor days in this alternative is based on a reduction from FY 2011. BLM estimated which days vending might occur in the ISDRA then multiplied the number times a projected number of vendors. See appendix 3 for market comparisons.

Vendor Permit Type	Number of Vendor Days or Long Term sites	Fee	Totals
Short Term	1,260 days	\$200/ day	\$252,000
Long Term	4 sites	\$7,000 season	\$28,000
			\$280,000

Cost Recovery Alternative (Proposed Alternative)

In the cost recovery alternative the BLM proposes rates that would support a self-sustaining program. Any surplus would be reinvested into the ISDRA. This alternative would simplify the program by prosing flat rates for both short and long term vending. Long term vending fee could be paid to the BLM in incremental amounts to reduce the financial burden to the vendor. The number of vendor days in this alternative is based on a reduction from FY 2011. BLM estimated which days vending might occur in the ISDRA then multiplied the number times a projected number of vendors. This alternative assumes that all four long term sites would be occupied and there would be 1,260 vendor days, a decrease from the current situation due to the increased cost for a permit.

Vendor Permit Type	Number of Vendor Days or Long Term sites	Fee	Totals
Short Term	1,260 days	\$100/ day	\$126,000
Long Term	4 sites	\$7,000 season	\$28,000
			\$154,000

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Appendix 1 – Individual Non-commercial Special Recreation Permit Fee worksheets

Alternative 1 - Proposed

Estimated permits to be sold		50),000
	Off	Site	On Site
Estimated % difference of on and off-site sales	85	i%	15%
Estimated permits sold on and off-site	42,	500	7,500
Proposed types of permits	weekly	seasonal	weekly
Estimated splits	65%	20%	15%
Estimated permits sold per category	32,500	10,000	7,500
PROPOSED cost of permit	\$40	\$180	\$70
POTENTIAL Revenues per category	\$1,300,000	\$1,800,000	\$525,000
Less vendor commission @ \$2.50 per permit (estimating 50% of permits sold on-site by BLM)	-\$81,250	-\$25,000	-\$9,375
POTENTIAL Sub Totals	\$2,99	3,750	\$515,625
POTENTIAL ISRP Total POTENTIAL Vendor SRP Total		\$3,509,375 \$154,000	
POTENTIAL FEE PROGRAM TOTAL		\$3,663,375	

Alternative 2

|--|

50,000

	Off	On Site	
Estimated % difference of on and off site sales	85%		15%
Estimated permits sold on and off site Proposed types of permits Estimated sales per permit type and location	42,5 weekly 65%	seasonal 20%	7,500 weekly 15%
Estimated permits sold	32,500	10,000	7,500
PROPOSED cost of permit	\$70	\$250	\$100
POTENTIAL Revenues per category	\$2,275,000	\$2,500,000	\$750,000
Less vendor commission at \$2.50 per permit (estimating 50% of permits sold on-site by BLM)	-\$81,250	-\$25,000	-\$9,375
POTENTIAL Sub Totals	\$4,66	\$740,625	

POTENTIAL ISRP Total	\$5,409,375
POTENTIAL Vendor SRP Total	\$154,000
POTENTIAL FEE PROGRAM TOTAL	\$5.563.375

Alternative 3

50,000

	Off	Site	On Site
Estimated % difference of on and off site sales	Off Site 85%		15%
Estimated permits sold on and off site Proposed types of permits	42,: weekly	500 seasonal	7,500 weekly
Estimated sales per permit type and location	65%	20%	15%
Estimated permits sold	32,500	10,000	7,500
PROPOSED cost of permit	\$35	\$100	\$50
POTENTIAL Revenues per category	\$1,137,500	\$1,000,000	\$375,000
Less vendor commission at \$2.50 per permit (estimating 50% of permits sold on-site by BLM)	-\$81,250	-\$25,000	-\$9,375
POTENTIAL Sub Totals	\$2,031,250		\$365,625
DOTENTIAL ISDD Total		¢2 206 975	

POTENTIAL ISRP Total	\$2,396,875
POTENTIAL Vendor SRP Total	\$154,000
POTENTIAL FEE PROGRAM TOTAL	\$2,550,875

Appendix 2 - Fees charged in similar OHV areas

Dumont Dunes Recreation Area, California

- \$30 weekly permit for any non-holiday week
- \$40 weekly permit that includes a holiday
- \$90 annual permit with holiday black-out dates
- \$120 annual permit that includes holidays

Sand Mountain Recreation Area, Nevada

- \$40 weekly permit
- \$90 annual permit
- Free Tuesday through Thursday

Little Sahara Recreation Area, UT

- \$18 per day
- \$9 per day for a second vehicle
- \$120 annual permit

St. Anthony Sand Dunes, ID

- \$5 per day
- \$10 per use of RV dump
- \$60 annual permit

Coral Pink Sand Dunes (BLM)

• \$5 per night

Coral Pink Sand Dunes (Utah State Parks)

- \$6 per vehicle
- \$16 camping fee
- \$3 for Utah seniors 62+
- \$75 Annual Day-Use Pass
- \$35 Senior Adventure (annual) Pass

Oceano Dunes State Vehicle Recreation Area (CA State Parks)

- \$5 per day
- \$10 per vehicle per night
- \$50 day use annual permit

El Mirage OHV Recreation Area

- \$15 per day
- \$30 per week
- \$90 per season

Appendix 3 - Vendor fees in other areas

pendix 5 - vendor fees in other areas					
Fee	Space Measurements	# of	<u>Total</u> Attendance	<u>Cost</u> per Day	
_		<u> </u>	- Teteria arioc	<u>por pay</u>	
EXPO	<u>)5</u>				
\$750	10' X 10'	3	50,000	\$250	
			81,800		
\$750	10' X 10'	2		\$375	
\$850	10' X 10'	2		\$425	
\$8,500	20' X 50'	2		\$4,250	
\$3,150	20' X 45'	2		\$1,575	
\$4,000	30' X 80'	2		\$2,000	
		13	150,000		
\$1,295	10' X 10'			\$100	
\$1,450	10' X 10'			\$112	
\$1,435	10' X 12'			\$110	
				\$100	
\$950	10' X 10'			\$73	
\$850	20' X 40'				
		4	20 000		
¢200	401 V 401		20,000	ćar	
				\$75 \$100	
\$400	10 X 10		CO 000	\$100	
Ć2 40F	10! V 10!	1	60,000	\$874	
		4			
				\$4,493	
	20 X 20		72.200	\$3,495	
		4	72,360	\$1,150	
		18	736,355		
\$3,120	10' X 10'			\$173	
	\$750 \$750 \$750 \$850 \$850 \$8,500 \$3,150 \$4,000 \$1,295 \$1,450 \$1,435 \$1,295 \$950 \$850 \$850 \$300 \$400 \$3,495 \$17,970 \$13,980 \$3,613 Fair	Space Measurements	Space # of Days	Fee Measurements Days Attendance	

			н - 6	<u>Total</u>	<u>Cost</u>
<u>Event/Site</u>	<u>Fee</u>	<u>Space</u> <u>Measurements</u>	# of Days	Attendance	per Day
Indoor Corner Buildings A,					
B & D	\$3,870	10' X 10'			\$215
Indoor Standard Building					
С	\$3,290	10' X 10'			\$183
Indoor Corner Building C	\$4,040	10' X 10'			\$224
Outdoor	\$2,300	10' X 10'			\$128
Outdoor w/ Electricity	\$2,525	10' X 10'			\$140
Cusuos II, 2.comois,	¥ 2,626	20 // 20			¥ 2.0
Food Vendor	\$2,000	10' X 10'			\$111
Kern County Fair			12	385,167	
Food Vendor	4500 or 25% of Daily Gross Sales Tax	10' X 10'			\$375
Standard Exhibit	\$1,000	10' X 10'			\$83.33
	+ = / > > >				,
Los Angeles County Fair			23	1,491,213	
<u>Indoor Locations</u>					
Expo Hall 4 North	\$4,400	10' X 10'			\$191.30
Expo Hall 4 North Corner	\$11,000	10' X 20'			\$478.26
Expo Hall 4 North Endcap	\$14,000	10' X 20'			\$608.70
Expo Hall 4 South	\$3,900	10' X 10'			\$169.57
Expo Hall 4 South Corner	\$7,200	10' X 20'			\$313.04
Expo Hall 4 South Endcap	\$11,900	10' X 20'			\$517.39
Expo Hall 5	\$3,100	10' X 10'			\$134.78
Expo Hall 5 Corner	\$7,200	10' X 20'			\$313.04
Expo Hall 5 Endcap	\$10,200	10' X 20'			\$443.48
Expo Halls 6 & 7	\$4,000	10' X 10'			\$173.91
Expo Halls 6 & 7 Corners	\$9,500	10' X 20'			\$413.04
Expo Halls 6 & 7 Endcaps	\$12,500	10' X 20'			\$543.48

			<u># of</u>	<u>Total</u>	<u>Cost</u>
<u>Event/Site</u>	<u>Fee</u>	<u>Space</u> <u>Measurements</u>	Days	<u>Attendance</u>	<u>per Day</u>
Expo Hall 9	\$4,100	10' X 10'			\$178.26
Expo Hall 9 Corner	\$9,700	10' X 20'			\$421.74
Expo Hall 9 Endcap	\$12,700	10' X 20'			\$552.17
<u>Outdoor Locations</u>					
Ash Standard	\$2,600	10' X 10'			\$113.04
Ash Corner	\$2,800	10' X 10'			\$121.74
Birch Standard	\$3,200	10' X 10'			\$139.13
Birch Corner	\$3,400	10' X 10'			\$147.83
Elm Standard	\$2,500	10' X 10'			\$108.70
Elm Corner	\$2,700	10' X 10'			\$117.39
Pepper Standard	\$5,200	20' X 20'			\$226.09
Pepper Corner	\$5,600	20' X 20'			\$243.48
Plaza de las Americas	\$2,750	10' X 10'			\$119.57
Sycamore North Standard	\$4,000	15' X 15'			\$173.91
Sycamore North Corner	\$4,400	15' X 15'			\$191.30
Sycamore South	\$2,000	10' X 10'			\$86.96
Orange County Fair	\$2,300	10' X 10'	23	1,400,280	\$100.00
Riverside County Fair				300,000	
Imperial County Fair				101,105	
Fair Averages	\$5,305		19	735,687	\$242.55
	OHV S	<u>ites</u>			
	\$200/ Day \$7000/	50' X 100'	3		\$200.00
Glamis Beach Store	Season	30 X 100	3		\$200.00
California State Parks					
	80,000/year or 10%				
	of gross receipts				
Carnegie SVRA	(whichever is greater)				
Carricgic SVIIA	7.5% of gross				
	receipts and 1% for				
Hollister Hills SVRA	maintenance				
Oceano Dunes SVRA					
	¢500/ma ar 50/ of				
	\$500/mo. or 5% of \$500,000 in gross				
	receipts, and 6.5%				
	over \$500,000,				
Angello's ATV Rental	whichever is greater				

<u>Event/Site</u>	<u>Fee</u>	<u>Space</u> <u>Measurements</u>	# of Days	<u>Total</u> <u>Attendance</u>	Cost per Day
Arnie's ATV Rental	\$500/month or 5% of \$500,000 in gross receipts, and 6.5% over \$500,000, whichever is greater				
BJ's ATV Rental	\$500/month or 5% of \$500,000 in gross receipts, and 6.5% over \$500,000, whichever is greater				
Luv-2-Camp LLC Steve's ATV Rental Service	\$500/month or 10% of gross receipts, whichever is greater \$500/month or 5% of gross receipts \$500,000 and 6.5% of \$500,000, whichever is greater				
Yo, Banana Boy! Inc. Ocotillo Wells SVRA	\$20,000/year or 10% of gross receipts, whichever is greater				
Luv-2-Camp LLC	10% of annual gross receipts up to \$500,000 and 12% over in Year 1; \$6,000/year or 10% gross receipts up to \$500,000 or 12% over, whichever is greater in year 2				

